

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
COLUMBIA DIVISION

GERMONTRIC DRIVER,

Plaintiff,

Vs.

ENOCH GEORGE, sheriff of Maury County  
LT. DEBRA WAGONSHUTZ,  
FLOYD SEALEY, a nurse,  
MAURY REGIONAL MEDICAL  
CENTER, ABL MANAGEMENT, INC.,  
and GENELLA POTTER,

Defendants.

NO: 1:12-cv-0054

Judge Haynes

Jury Demand

*2/20/14*  
*Considering the*  
*plans by the parties in*  
*this motion, this motion*  
*is DENIED for the reasons*  
*stated in Plaintiff's*  
*Response to this*  
*motion.*  
*C. J. H. V.*  
*9/3/14*

DEFENDANTS ABL MANAGEMENT, INC. AND  
GENELLA POTTER'S MOTION TO COMPEL WRITTEN DISCOVERY

Come now Defendants ABL Management, Inc. and Genella Potter, (hereinafter  
"Defendants"), by and through counsel, pursuant to FEDERAL RULE OF CIVIL PROCEDURE 37(a), and  
move the Court to compel Plaintiff to respond to Defendants' Second Set of Interrogatories. In  
support of this Motion, Defendants rely upon the Second Set of Written Discovery propounded by  
Defendants to Plaintiff on February 20, 2014, attached hereto as **Exhibit 1**; the March 18, 2014 letter  
from Paul Brewer to Gene Hallworth, attached hereto as **Exhibit 2**; and the Memorandum of Law  
and Statement-Certifying Good Faith Effort to Resolve Discovery Dispute which are filed  
contemporaneously herewith and incorporated herein by reference.

**WHEREFORE**, Defendants request that this Court compel Plaintiff to respond fully to the  
Interrogatories within ten (10) days of the Court granting this Motion.